

In the District Court of Douglas County, Kansas  
Judicial & Law Enforcement Center  
Lawrence, Kansas 66044

For Court Use Only

DOUGLAS COUNTY  
DISTRICT COURT

2012 JUN 14 PM 1:06

BY \_\_\_\_\_

STATE OF KANSAS,

Plaintiff,

vs.

DEBORAH MARTHA GOMEZ,  
111 N Wolf Rd, North Lake, IL 60161

Defendant.

2-12-7806

Case No. 2012CR0547  
DOUGLAS COUNTY, KANSAS

**PROBABLE CAUSE INFORMATION**

Amy McGowan, Assistant District Attorney, of lawful age, being first duly sworn on oath, for complaint against the above shown defendant, alleges and states:

**Count 1**

That on or about the 13th day of June, 2012, in Douglas County, Kansas, one Deborah Martha Gomez, did then and there unlawfully, feloniously, and knowingly inflict cruel and inhuman corporal punishment upon any child under the age of 18 years, to-wit: OAG (DOB: 07/06/2004), all in violation of K.S.A. 2011 Supp. 21-5602(a)(3). (Abuse of a Child, Level 5/Person/Felony)

**Count 2**

That on or about the 13th day of June, 2012, in Douglas County, Kansas, one Deborah Martha Gomez, did then and there unlawfully, feloniously, and knowingly inflict cruel and inhuman corporal punishment upon any child under the age of 18 years, to-wit: TJG (DOB: 06/26/2007), all in violation of K.S.A. 2011 Supp. 21-5602(a)(3). (Abuse of a Child, Level 5/Person/Felony)

**Count 3**

That on or about the 13th day of June, 2012, in Douglas County, Kansas, one Deborah Martha Gomez, did then and there unlawfully and feloniously and recklessly cause or permit a child under the age of 18 years, to-wit: OAG (DOB: 07/06/2004), to be placed in a situation in which the child's life, body or health may be endangered, all in violation of K.S.A. 2011 Supp. 21-5601(b)(1). (Aggravated endangering a child, Level 9/Person/Felony)

**Count 4**

That on or about the 13th day of June, 2012, in Douglas County, Kansas, one Deborah Martha Gomez, did then and there unlawfully and feloniously and recklessly cause or permit a child under the age of 18 years, to-wit: TJG (DOB: 06/26/2007), to be placed in a situation in which the child's life, body or health may be endangered, all in violation of K.S.A. 2011 Supp. 21-5601(b)(1). (Aggravated endangering a child, Level 9/Person/Felony)

**Count 5**

That on or about the 13th day of June, 2012, in Douglas County, Kansas, one Deborah Martha Gomez, did then and there unlawfully and feloniously and recklessly cause or permit a child under the age of 18 years, to-wit: FMG (DOB: 04/14/1998), to be placed in a situation in which the child's life, body or health may be endangered, all in violation of K.S.A. 2011 Supp. 21-5601(b)(1). (Aggravated endangering a child, Level 9/Person/Felony)

**Count 6**

That on or about the 13th day of June, 2012, in Douglas County, Kansas, one Deborah Martha Gomez, did then and there unlawfully and feloniously and recklessly cause or permit a child under the age of 18 years, to-wit: HNG (DOB: 09/02/1999), to be placed in a situation in which the child's life, body or health may be endangered, all in violation of K.S.A. 2011 Supp. 21-5601(b)(1). (Aggravated endangering a child, Level 9/Person/Felony)


**Count 7**

That on or about the 13th day of June, 2012, in Douglas County, Kansas, one Deborah Martha Gomez, did then and there unlawfully and feloniously and recklessly cause or permit a child under the age of 18 years, to-wit: JG (DOB: 07/24/1996), to be placed in a situation in which the child's life, body or health may be endangered, all in violation of K.S.A. 2011 Supp. 21-5601(b)(1). (Aggravated endangering a child, Level 9/Person/Felony)

Felony Penalty Section: K.S.A. 2011 Supp. 21-6804

**Witnesses:**

OAG (DOB: 7/6/2004)  
TJG (DOB: 6/26/2007)  
FMG (DOB: 4/14/1998)  
HNG (DOB: 9/2/1999)  
JG (DOB: 7/24/1996)  
Jon D Barta  
Lindsay Bishop  
Warren P Burket  
Evidence Officer  
Hayden Fowler  
Randy S Glidewell  
Nathaniel J Haig  
James R Miller  
Records Custodian  
Charles J Stewart  
Mark Alan Unruh  
Lisa Wilcox

  
\_\_\_\_\_  
Amy McGowan, 12215  
Assistant District Attorney

Subscribed and sworn to before me this 14th day of June, 2012.



*Cathy Reyes*  
\_\_\_\_\_  
Notary Public  
Term Expires: 12/20/2013

Probable Cause Arrest -- appearance bond requirement is ----- \$ \_\_\_\_\_

Notice: Information about the Diversion Program is available through the District Attorney's Office.